

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

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SUBJECT: SCP-Carlstadt Meeting, February 28, 1990

FROM: Janet Feldstein, Project Manager
Northern New Jersey Compliance SectionTO: Raymond Basso, Chief
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On February 28, 1990 a meeting was held in EPA's Edison, New Jersey office with respect to the SCP Carlstadt site. The purpose of the meeting was to advise the SCP Carlstadt PRPs of EPA's strategy for addressing remediation of the site. Attached is a list of persons in attendance at the meeting and their respective affiliations. Provided below is a summary of what was discussed at the meeting.

EPA opened the meeting by explaining that the Agency had extensively reviewed the PRPs' Feasibility Study (FS). Since the site is technically complex, we requested assistance from EPA experts in our Office of Research and Development (ORD). Based upon this review, the Agency has determined that the PRPs did not provide adequate information with respect to viable treatment options to allow EPA to select a permanent remedy for the site which is protective of human health and the environment. EPA stated that, in order to select a permanent remedy, further treatability studies will be required to more fully evaluate feasible treatment alternatives. It is anticipated that the conduct of the treatability studies and subsequent decision making process will require a considerable amount of time. Since the potential risks posed by the site demonstrate a need to implement a response action before such treatability studies are completed, the Agency has concluded that an interim remedial action should be undertaken. The interim remedy that EPA intends to move forward with consists of the common components of all of the alternatives developed and evaluated in the PRPs' FS (with the exception of the No Action alternative.) The interim RA will include the installation of a slurry wall and a groundwater extraction and treatment system. Since the PRPs determined that these components were necessary for all remedial alternatives, EPA explained that the interim remedy would be consistent with any potential final remedy selected for the site. In addition, EPA explained that the remedy would include provisions for conducting additional treatability and feasibility studies.

EPA further explained that this interim remedy is not a fully protective measure in and of itself. The interim remedy represents temporary response to control further releases from the site, but will not be the final remedy for the site.

The PRPs expressed agreement with the general technical approach and indicated that they had also considered this option. We then discussed the mechanics behind implementing this approach.

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EPA informed the PRPs that the FS would require revision. EPA explained that one of the major problems with the PRPs' draft FS is that EPA's comment with respect to evaluating partial site treatment options was improperly addressed even upon subsequent verbal clarification by EPA. This misinterpretation of EPA's comment resulted in the development of 32 alternatives in the FS which has made the document difficult to read and evaluate. The FS needs to be revised to delete the partial site alternatives that were incorrectly added. In addition, revisions need to be made to ensure that the FS is not inconsistent with the approach outlined during the meeting. Specifically, EPA wants to ensure that the FS does not rule out any potential treatment technology which might be applicable to the site for a permanent remedy. EPA will provide a list of required revisions to the PRPs.

The PRPs proposed to revise the FS so it supports only the "groundwater" interim remedy. Some discussion followed to clarify that although this alternative will address the shallow groundwater it is not a "groundwater" remedy. Rather, it is the first part of a permanent remedy for shallow soils, sludges and groundwater. EPA also explained that we considered revising the FS to include only the information needed to support the interim remedy, but rejected that approach. We recognized that significant time and effort went into development of the FS, and explained that EPA did not want to disregard that. Furthermore, since the information in the FS assisted the Agency in reaching the conclusion that currently there is not enough data to select a permanent RA, we believe that the public should have the opportunity to review the same information. EPA advised the PRPs that we intend to issue a proposed plan which will describe and support the interim remedy approach and that we do not want the revised FS to address this.

The PRPs asked if the proposed plan will include the scope of the remaining treatability studies. EPA responded that the plan would explain the approach, which includes additional studies, but would not provide the specific scope of the studies.

The PRPs inquired as to what the next step would be in terms of a consent decree. EPA responded that our primary objective is to select an interim remedy, and that we will be concentrating our efforts to achieve that goal. After the ROD is signed, we will pursue options for having the work done by the PRPs.

The PRPs asked what our schedule was for signing the ROD. EPA explained that before the FS could be in draft final form, we need the ARARs for surface water discharge. We stated that NJDEP is to provide EPA with these ARARs and that we expected them shortly, however, they are presently several months past due. After the FS is revised there will be a public comment period, then the ROD can be signed.

There was then a discussion regarding the basis for developing the ARARs. NJDEP explained that the ARARs will be based on water quality standards and will include discharge limitations (i.e., concentration based standards), which is based on expected flow rate, and that the monitoring requirements would also be provided. The PRPs asked if they could contact the individuals in DEP that would be developing the ARARs. DEP representatives agreed to ask those persons to see if they will be talk to PRPs. The PRPs asked if the discharge limits would be included in the ROD. EPA responded that the limits would be included.

In addition, EPA pointed out that the PRPs should further explore the possibility of using the Bergen County POTW. As EPA had previously informed the PRPs, it is believed that BCUA is having permit/capacity difficulties and it is unlikely that they will be able to accept treated groundwater. The PRPs will follow up on this issue. EPA will provide the PRPs with the names of contacts at DEP and EPA who are responsible for the POTW.

The PRPs inquired into the schedule for conducting the treatability studies for the permanent RA. EPA responded that since the Agency needs to concentrate its efforts on signing of the ROD for the interim remedy, we will wait until the ROD is signed before the treatability studies are initiated. In addition, since ORD has been involved with the site, we have requested their assistance in scoping the treatability studies.

The PRPs expressed a desire to have all parties that could have an interest in the project on board with the approach. For example, the Army Corps of Engineers may be interested since the site is in the flood plain. EPA stated that we would touch base with the appropriate persons. The PRPs also questioned whether or not the Hackensack Meadowlands Development Commission (HMDC) should be informed of our plans for the interim remedy. As a courtesy, EPA will advise HMDC of the interim approach.

The PRPs raised the issue that they will need to know what the permanent remedy will be in order to properly design the slurry wall. They stated that different construction materials could be used depending on the type of treatment that would be ultimately utilized. They asked if the Agency had ruled out any options at this point. After a short break, EPA responded that we had not ruled out any potential treatment or containment options. At this point, we are still considering a range of alternatives from incineration to containment. Therefore, the wall should be designed to meet the "worst case scenario". That is, if containment is ultimately selected, the slurry wall should be designed to meet that objective.

The PRPs inquired as to whether or not the type of extraction and treatment system would be specified in the proposed plan. EPA

advised them that it would not be.

EPA inquired about the length of time the PRPs believed would be necessary to design/construct the interim remedy. One PRP representative stated that the design would probably take approximately one year to complete from the time the ROD was signed, and then construction could be completed within 6 months to one year from design approval. The PRPs' Facility Coordinator expressed his view that the complete design/construction of a slurry wall could be completed within one year.

The PRPs commented that there may be a need to conduct pilot studies in design stage (e.g. test panel for a slurry wall.) EPA agreed to include in the ROD a provision for conducting such studies.

The PRPs asked if they could also install a temporary cover such as a plastic material as part of the interim remedy, in order to control infiltration. EPA responded that we would consider that, as long as the PRPs acknowledged that it would be temporary.

Other topics raised by the PRPs included a recent meeting they had attended at NJDEP regarding the Ventron/Velsicol site ("Berry's Creek"), where NJDEP presented a "watershed approach" to the study of the area. The PRPs explained that Morton Thiokol and the Velsicol Corporation had filed a lawsuit against some of them. The PRPs also stated they did not yet have a position with respect to participation in a watershed study, but wanted to ensure that any work that they did with respect to the SCP site was not duplicative of other work they were being asked to perform by NJDEP/Morton Thiokol/Velsicol. EPA stated that we would discuss this issue further at a later date.

Finally, the PRPs informed EPA that the City of Newark Fire Department had informed the PRPs that the site owners (Presto & Sigmond) have claimed that the Agency is not allowing them on site to perform necessary repairs. The PRPs suspected that this is untrue, and we informed them that it was untrue. The PRPs will provide EPA with the name of the contact point in the Fire Department, so that EPA can clarify its position.

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SCP-CARLSTADT MEETING
2/28/90

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